# ORIGINAL

REDACTED - FOR PUBLIC INSPECTION

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March 4, 2002

William F. Caton Acting Secretary Federal Communications Commission 445 12th Street, S.W. Washington, DC 20554

MAR - 4 2002

PARTIE CONNECTION DE LOCAMISSION (PERO DE TRE SERVICIONE)

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Re:

Request for Confidential Treatment

Dear Mr. Caton:

On behalf of NewSouth Communications Corp. and pursuant to the Commission's protective order in CC Docket No. 02-35/I am filing the attached redacted version of the confidential portion of NewSouth's comments in CC Docket No. 02-35, which are being filed today. I am also simultaneously filing the confidential version of this submission under a separate cover letter.

The information contained in the confidential portion of NewSouth's comments is proprietary commercial and financial information that is routinely withheld from public disclosure. Moreover, because the confidential portion of NewSouth's comments contains NewSouth's own data on BellSouth's order completion and maintenance and repair, disclosure of this information would harm NewSouth's competitive position by giving its competitors knowledge of the timeliness of the service it receives from BellSouth and, in turn, NewSouth's ability to provision service to its customers. When this information is aggregated with other information that competitors may discover by other means, the adverse competitive impact could be even greater.

Accordingly, NewSouth respectfully requests that the Commission treat the proprietary business information filed herewith confidentially pursuant to the protective order in this proceeding.

Sincerely,

Jake E. Jennings

John E. Jummy

Vice President, Regulatory Affairs NewSouth Communications Corp.

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#### **ATTACHMENT 1**

**Order Completion:** The following data were computed by NewSouth based on BellSouth's performance during the months of August 2001 through January 2002:

Performance Measure	Month	NewSouth
Simple UNE Platform Orders Completed Within 1 or 2 Days	August 2001	[REDACTED]
	September 2001	[REDACTED]
	October 2001	[REDACTED]
	November 2001	[REDACTED]
	December 2001	[REDACTED]
	January 2002	[REDACTED]
Simple UNE Platform Orders Completed In Less Than 1 Day	Month	NewSouth
	August 2001	[REDACTED]
	September 2001	[REDACTED]
	October 2001	[REDACTED]
	November 2001	[REDACTED]
	December 2001	[REDACTED]
	January 2002	[REDACTED]

Complex UNE Platform Orders Completed Within 2 Days	Month	NewSouth
	August 2001	[REDACTED]
	September 2001	[REDACTED]
	October 2001	[REDACTED]
	November 2001	[REDACTED]
	December 2001	[REDACTED]
	January 2002	[REDACTED]
UNE DS-1 Orders Completed Within 10 Days	Month	NewSouth
	August 2001	[REDACTED]
	September 2001	[REDACTED]
	October 2001	[REDACTED]
	November 2001	[REDACTED]
	December 2001	[REDACTED]
	January 2002	[REDACTED]

Maintenance and Repair: The following data, covering the months of July 2001 through January 2002, were provided to NewSouth by BellSouth.

<b>Customer Trouble</b> <b>Report Rate</b>	Month	BellSouth Retail	NewSouth
	July 2001	[REDACTED]	[REDACTED]
	August 2001	[REDACTED]	[REDACTED]
	September 2001	[REDACTED]	[REDACTED]

	Month	BellSouth Retail	NewSouth
	October 2001	[REDACTED]	[REDACTED]
	November 2001	[REDACTED]	[REDACTED]
	December 2001	[REDACTED]	[REDACTED]
	January 2002	[REDACTED]	[REDACTED]
Missed Repair Appointments	Month	BellSouth Retail	NewSouth
	July 2001	[REDACTED]	[REDACTED]
	August 2001	[REDACTED]	[REDACTED]
	September 2001	[REDACTED]	[REDACTED]
	October 2001	[REDACTED]	[REDACTED]
	November 2001	[REDACTED]	[REDACTED]
	December 2001	[REDACTED]	[REDACTED]
	January 2002	[REDACTED]	[REDACTED]
Maintenance Average Duration	Month	BellSouth Retail	NewSouth
	July 2001	[REDACTED]	[REDACTED]
	August 2001	[REDACTED]	[REDACTED]
	September 2001	[REDACTED]	[REDACTED]
	October 2001	[REDACTED]	[REDACTED]
	November 2001	[REDACTED]	[REDACTED]
	December 2001	[REDACTED]	[REDACTED]
	January 2002	[REDACTED]	[REDACTED]

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	November 2001	[REDACTED]
	December 2001	[REDACTED]
	January 2002	[REDACTED]
Simple UNE Platform Orders Completed In Less Than 1 Day	Month	NewSouth
	August 2001	[REDACTED]
	September 2001	[REDACTED]
	October 2001	[REDACTED]
	November 2001	[REDACTED]
	December 2001	[REDACTED]
	January 2002	[REDACTED]

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	August 2001	[REDACTED]
	September 2001	[REDACTED]
	October 2001	[REDACTED]
	November 2001	[REDACTED]
	December 2001	[REDACTED]
	January 2002	[REDACTED]
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	August 2001	[REDACTED]
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	November 2001	[REDACTED]
	December 2001	[REDACTED]
	January 2002	[REDACTED]

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Customer Trouble Report Rate	Month	BellSouth Retail	NewSouth
	July 2001	[REDACTED]	[REDACTED]
	August 2001	[REDACTED]	[REDACTED]
	September 2001	[REDACTED]	[REDACTED]

	Month	BellSouth Retail	NewSouth
	October 2001	[REDACTED]	[REDACTED]
	November 2001	[REDACTED]	[REDACTED]
	December 2001	[REDACTED]	[REDACTED]
	January 2002	[REDACTED]	[REDACTED]
Missed Repair Appointments	Month	BellSouth Retail	NewSouth
	July 2001	[REDACTED]	[REDACTED]
	August 2001	[REDACTED]	[REDACTED]
	September 2001	[REDACTED]	[REDACTED]
	October 2001	[REDACTED]	[REDACTED]
	November 2001	[REDACTED]	[REDACTED]
	December 2001	[REDACTED]	[REDACTED]
	January 2002	[REDACTED]	[REDACTED]
Maintenance Average Duration	Month	BellSouth Retail	NewSouth
	July 2001	[REDACTED]	[REDACTED]
	August 2001	[REDACTED]	[REDACTED]
	September 2001	[REDACTED]	[REDACTED]
	October 2001	[REDACTED]	[REDACTED]
	November 2001	[REDACTED]	[REDACTED]
	December 2001	[REDACTED]	[REDACTED]
	January 2002	[REDACTED]	[REDACTED]

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	December 2001	[REDACTED]
	January 2002	[REDACTED]
Simple UNE Platform Orders Completed In Less Than 1 Day	Month	NewSouth
	August 2001	[REDACTED]
	September 2001	[REDACTED]
	October 2001	[REDACTED]
	November 2001	[REDACTED]
	December 2001	[REDACTED]
	January 2002	[REDACTED]

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	August 2001	[REDACTED]
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	October 2001	[REDACTED]
	November 2001	[REDACTED]
	December 2001	[REDACTED]
	January 2002	[REDACTED]
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	August 2001	[REDACTED]
	September 2001	[REDACTED]
	October 2001	[REDACTED]
	November 2001	[REDACTED]
	December 2001	[REDACTED]
	January 2002	[REDACTED]

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	Month	BellSouth Retail	NewSouth
	October 2001	[REDACTED]	[REDACTED]
	November 2001	[REDACTED]	[REDACTED]
	December 2001	[REDACTED]	[REDACTED]
	January 2002	[REDACTED]	[REDACTED]
Missed Repair Appointments	Month	BellSouth Retail	NewSouth
	July 2001	[REDACTED]	[REDACTED]
	August 2001	[REDACTED]	[REDACTED]
	September 2001	[REDACTED]	[REDACTED]
	October 2001	[REDACTED]	[REDACTED]
	November 2001	[REDACTED]	[REDACTED]
	December 2001	[REDACTED]	[REDACTED]
	January 2002	[REDACTED]	[REDACTED]
Maintenance Average Duration	Month	BellSouth Retail	NewSouth
9	July 2001	[REDACTED]	[REDACTED]
	August 2001	[REDACTED]	[REDACTED]
	September 2001	[REDACTED]	[REDACTED]
	October 2001	[REDACTED]	[REDACTED]
	November 2001	[REDACTED]	[REDACTED]
	December 2001	[REDACTED]	[REDACTED]
	January 2002	[REDACTED]	[REDACTED]

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